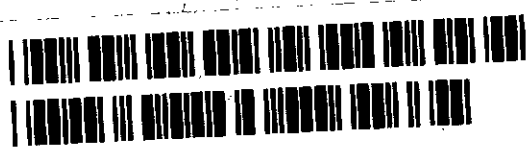


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WESTERN DISTRICT OF WASHINGTON  
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**LIAOSHENG ZHANG**  
12334 31<sup>st</sup> AVE. NE, #306  
Seattle, WA 98125  
Phone: 206-364-1348

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON**

<b>Liaosheng Zhang,</b>	)	
<b>Plaintiff,</b>	)	<b>CASE No. 7-1794 RAJ</b>
<b>Vs.</b>	)	<b>AMENDED COMPLAINT</b>
<b>Boeing Company,</b>	)	<b>WITH JURY DEMAND</b>
<b>Amazon Global Resources, Inc.,</b>	)	
<b>Microsoft Corporation,</b>	)	
<b>Defendants.</b>	)	
-----	)	

**COMES NOW** the plaintiff, Liaosheng Zhang, and alleges as follows for her complaint:

**I. NATURE OF ACTION**

1.1 This is a civil action based on 42 U.S.C. § §2000e et seq. ("Title VII") and the Age Discrimination in Employment Act ("ADEA") seeking a remedy for discrimination on the basis of race, national origin, gender, disability and age which occurred during Plaintiff applied defendant's jobs in Seattle, Washington.

**II. JURISDICTION AND VENUE**

- 2.1 This court has jurisdiction over the federal claims under 28U.S.C. § 1331.
- 2.2 This court has jurisdiction over the ancillary state claims under 28 U.S.C. § 1367.
- 2.3 Venue is proper under 28 U.S.C. § 1391(b) and Local Civil Rule 5(e).
- 2.4 Liaosheng Zhang did get a "ready to sue letter" from EEOC.

**III. PARTIES**

- 3.1 Liaosheng Zhang ("Plaintiff") is a U.S worker and a job applicant of Defendants Boeing Company, Amazon Global Resources, Inc., and Microsoft Corporation.
- 3.2 Boeing Company has many names and addresses in many states:
- a) World Headquarters  
Boeing Corporate Offices 100 North Riverside  
Chicago, Illinois 60606  
312-544-2000
  - b) Washington state Registered Agent:  
CORPORATION SERVICE COMPANY  
6500 HARBOUR HEIGHTS PKWY, STE 400  
MUKILTEO, WA 98275
  - c) One of Washington Locations:  
P. O. Box 3707  
Seattle, Washington 98124  
206-655-2121
  - d) Other states
- 3.5 Amazon Global Resources, Inc. address is 1200 12th Avenue South, Suite 1200, Seattle, WA 98144. Registered Agent address is C T CORPORATION SYSTEM, 1801 WEST BAY DR NW STE 206, OLYMPIA, WA 98502

1 3.6 Microsoft Corporation address is One Microsoft Way, Redmond, WA 98052.  
2 Registered Agent address is PTSGE CORP, 925 FOURTH AVENUE STE  
3 2900, SEATTLE, WA 98104-1158  
4

5 **IV. STATEMENT OF FACTS**

6 **4.1 Boeing Company:**

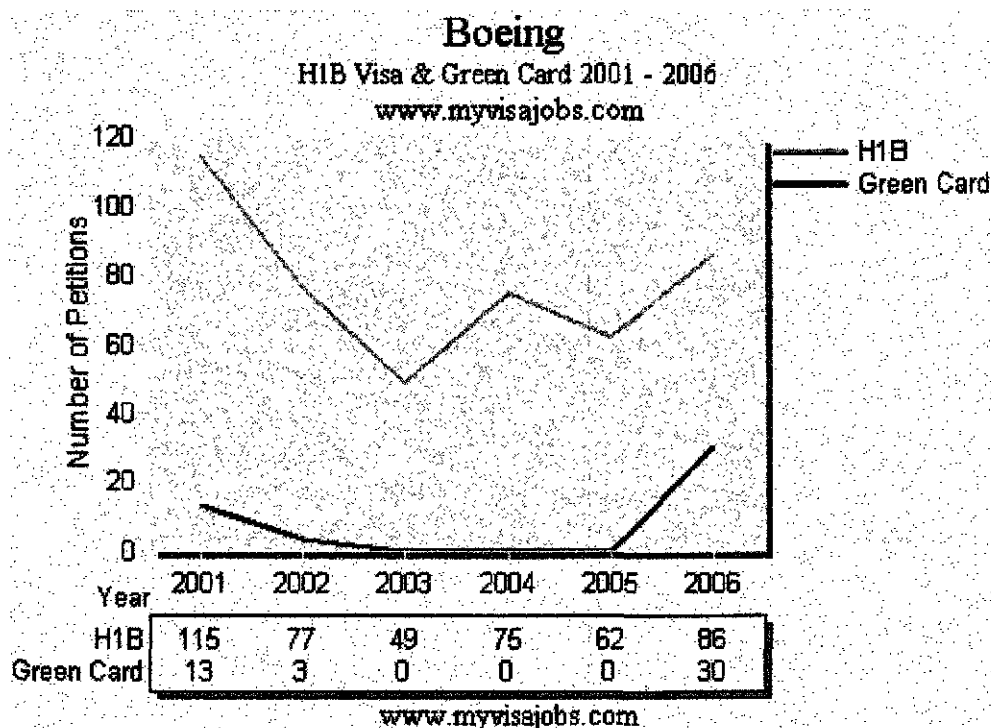
7 4.1.1 I am a US worker as defined by §655.715 of chapter V of Title 20 of ETA. I  
8 applied to over 300 Boeing jobs and their contract jobs. My resume is on their  
9 database, but I never get hired.

10 4.1.2 I had a few interviews. I answered questions so well during the first round  
11 interview. They said that I will go to second round. I called them 2 times after that.  
12 But they never call me for second round interview.

13 4.1.3 I mailed to them the Employer Research Form (from WorkSource) and my  
14 resume. I asked them to fill it out around 8/16/06, but they never did.

15 I do not lack any skills for a software engineer or any IT positions. I continued to  
16 apply to their jobs, but I never hear anything from them. I have a master's degree  
17 in computer engineering from Arizona State University and 7 years work  
18 experience in the computer field. But Boeing refuses to hire me.

19 4.1.4 Boeing hired 62 H1B foreign workers during 2005. Boeing hired some  
20 workers with optional practice training card during 2005. They are not U.S.  
21 workers. Boeing hires them because they are much younger and therefore have  
22 less medical liabilities to the company.



4.1.5 Boeing hired about 66 H1B foreign workers during 2006. Boeing sponsored 30 green cards during 2006. Boeing hired some workers with optional practice training card during 2006. They are not U.S. workers. Boeing hires them because they are much younger and therefore have less medical liabilities to the company.

4.1.6 Boeing hired many H1B holders during 2007 too.

4.1.7 Boeing hired many contract workers who are not U.S workers from 2005 to 2007.

4.1.8 Boeing retaliated or discriminated against a job applicant for disclosing information, filing a complaint, or cooperating in an investigation

4.1.9 Boeing failed to recruit U.S. worker(s) for jobs for which H-1B worker(s) are sought.

4.1.10 Boeing failed to hire a U.S. worker who applied and was equally or better qualified for the job for which the H-1B worker was sought.

4.1.11 Liaosheng Zhang is an Asian, Chinese, female, and 49 years old who had a lot of medical bills in the past.

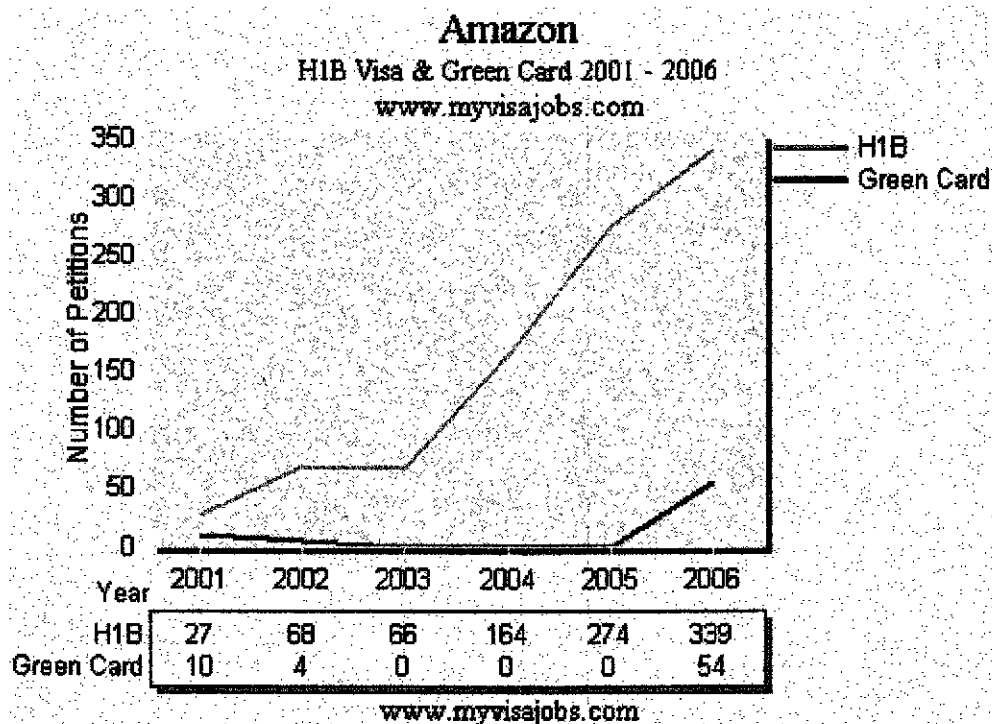
1 4.1.12 Liaosheng Zhang received a "ready to sue letter" from EEOC. Liaosheng  
 2 Zhang filed this lawsuit within 90 days of my receipt of the notice. Exhibit 1.  
 3

4 **4.2 Amazon Global Resources Inc. :**

5 4.2.1 I am a US worker as defined by §655.715 of chapter V of Title 20 of ETA. I  
 6 applied to over 386 Amazon jobs among thousands of jobs. My resume is  
 7 on their database, but I never get hired or interviewed.

8 4.2.2 I have a master's degree in computer engineering from Arizona State  
 9 University and 7 years work experience in the computer field, but Amazon  
 10 refuses to hire me.

11 4.2.3 Amazon hired 274 H1B foreign workers during 2005. Amazon hires them  
 12 because they are much younger and therefore have less medical liabilities  
 13 to the company.  
 14



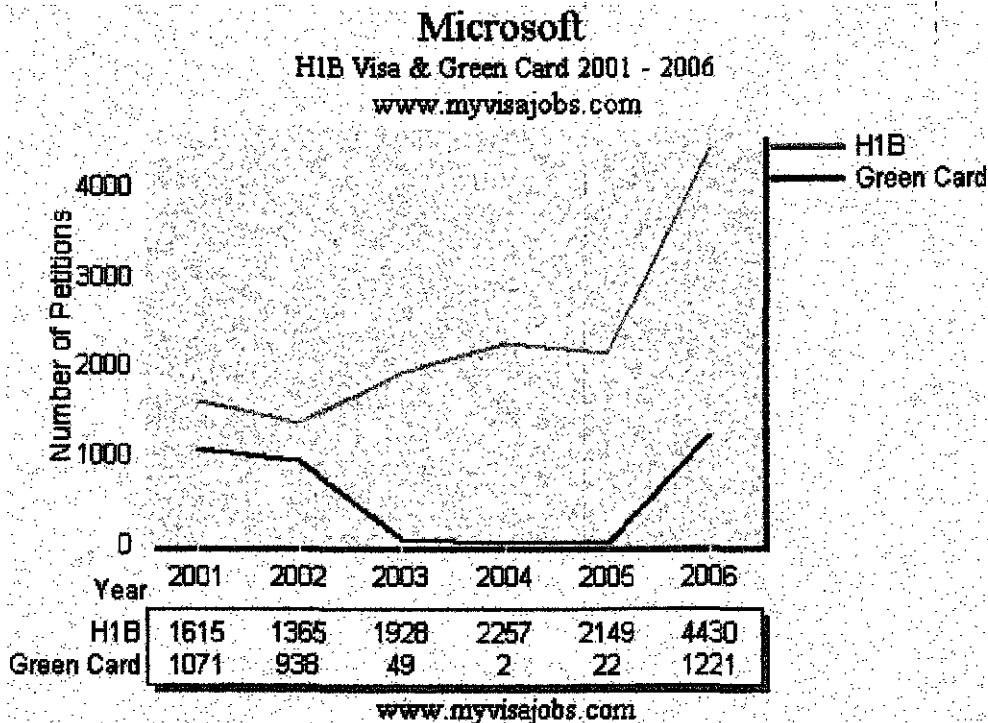
- 1 4.2.4 Amazon hired about 339 H1B foreign workers during 2006. Amazon  
2 sponsored 54 green cards during 2006: 34 are software engineers, 2 are in  
3 the computer field. Amazon hires them because they are much younger  
4 and therefore have less medical liabilities to the company.
- 5 4.2.5 Amazon hired many H1B holders during 2007 too. Amazon hires them  
6 because they are much younger and therefore have less medical liabilities  
7 to the company.
- 8 4.2.6 Amazon retaliated or discriminated against a job applicant for disclosing  
9 information, filing a complaint, or cooperating in an investigation.
- 10 4.2.7 Amazon failed to recruit U.S. worker(s) for jobs for which H-1B worker(s)  
11 are sought.
- 12 4.2.8 Amazon failed to hire a U.S. worker who applied and was equally or better  
13 qualified for the job for which the H-1B worker was sought
- 14 **4.3 Microsoft Corporation:**
- 15 4.3.1 I am a US worker as defined by §655.715 of chapter V of Title 20 of  
16 Employment and Training Administration (ETA).
- 17 4.3.2 I applied to over 100 Microsoft jobs and their contract jobs among 10,000.  
18 My resume is on their database, but I never get hired.
- 19 4.3.3 I mailed to them the Employer Research Form (from WorkSource) and my  
20 resume. I asked them to fill it out around 8/16/06, but they never did.  
21 Instead, they sent a letter to me saying that they don't take job applications  
22 by mail and asked me to apply to their jobs on their website again. So I do  
23 not lack any skills for a software engineer position.
- 24 4.3.4 I continue to apply to their jobs, but I never hear anything from them. In fact,  
25 I am on their block list because I have a pending lawsuit against a previous  
26 employer on my background check, and because I am a US worker, and an  
27 elder woman.
- 28 4.3.5 I went to the Microsoft campus a few times. They have about 1/3 foreign  
29 workers. Their worker age groups are not reflective of the work force age

1 range. Most of them are under 35. Since older workers have more medical  
2 bills, they dislike hiring that age group.

3 4.3.6 I saw on the news around 3/10/07 that Bill Gates appealed to the US  
4 congress to issue more H1B visas to bring foreign workers to this country  
5 because we have a shortage for software engineers. That is not true. I have  
6 a masters degree in computer engineering from Arizona State University  
7 and 7 years experience in the computer field. But Microsoft refuses to hire  
8 me.

9 4.3.7 I sent my response to Gates' appeal to the US Senate around 3/25/07.

10 4.3.8 Microsoft hired 2149 H1B foreign workers during 2005 in Washington State  
11 and another 4430 H1B foreign workers during 2006 in Washington State  
12 according to the Department of Labor record. Microsoft hires them because  
13 they are much younger and therefore have less medical liabilities to the  
14 company.  
15



1 4.3.9 Microsoft uses few employment services (Excel, Volt, and others) to get  
2 many contract engineers. Microsoft has a strong policy against contract  
3 work period, maximum one year. After one year, a contractor has to take at  
4 last a 3 month break before getting another Microsoft contract job. Many  
5 contract software engineers are US workers, but Microsoft forced them to  
6 leave their jobs and hired other H1B holders.

7 4.3.10 Microsoft retaliated or discriminated against a job applicant for disclosing  
8 information, filing a complaint, or cooperating in an investigation.

9 4.3.11 Microsoft failed to recruit U.S. worker(s) for jobs for which H-1B worker(s)  
10 are sought.

11 4.3.12 Microsoft failed to hire a U.S. worker who applied and was equally or better  
12 qualified for the job for which the H-1B worker was sought.

13  
14 **V. FIRST CLAIM FOR RELIEF DISCRIMINATION UNDER TITLE VII AND ADEA**

15 5.1 Plaintiff restates paragraph 1 through 4.5 of this complaint as if fully alleged  
16 herein.

17 5.2 At all relevant times, Defendant was a covered entity within the meaning of  
18 42 U.S.C. § 12111(2).

19 5.3 Plaintiff has satisfied all of the procedural and administrative requirements  
20 set forth in Section 706 of Title VII, 42 U.S.C. § 2000e-5 and ADEA, as follows:

21 a. Plaintiff filed a timely written charge of discrimination with the Equal  
22 Employment Opportunity Commission;

23 b. Plaintiff received a "Notice of Right to Sue" from the Equal Employment  
24 Opportunity Commission on or about August 13, 2007;

25 c. The Plaintiff's complaint was filed with this court within 90 days of Plaintiff's  
26 receipt of the Notice of Right to Sue.

27 5.4 Defendant engaged in intentional discrimination because of Plaintiff's  
28 gender, race, national origin, disability and age, and because of her opposition to  
29 Defendant's unlawful employment practices.

1 5.5 Defendants refused to hire Plaintiff action have caused Plaintiff to suffer  
2 emotional damages, lost wages, benefits, employment opportunities, and to incur  
3 expenses, including attorney fees.  
4

## 5 VI. DAMAGES

6 6.1 Plaintiff restates paragraph 1 through 5.5 of this complaint as if fully alleged  
7 herein.

8 6.2 As a result of Defendant's conduct, Plaintiff has suffered and will continue  
9 to suffer: loss of wages and benefits; emotional pain and distress; and other  
10 consequential damages of financial loss.

11 6.3 As a result of Defendant's conduct, Plaintiff has had to retain the services of  
12 an attorney and will incur expenses, including attorney fees.  
13

## 14 VII. JUDY DEMAND

15 7.1 Plaintiff hereby demands a jury trial.  
16

## 17 VIII. PRAYER FOR RELIEF

18 WHEREFORE, Plaintiff prays that this court:

19 8.1 Declare that the actions of the Defendant as alleged in this complaint were  
20 discriminatory and retaliatory and order defendant to cease such actions as  
21 to Defendant's current employees.

22 8.2 Order Defendant to institute and maintain a reasonable procedure to  
23 investigate and remedy complaints of unlawful discrimination in a timely  
24 manner.

25 8.3 Enter judgment for the Plaintiff awarding her all lost pay and benefits,  
26 awarding her damages for emotional suffering in the amount determined by  
27 the jury.

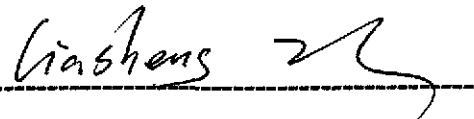
28 8.4 Enter judgment for Plaintiff awarding her punitive damages in an amount  
29 determined by the jury pursuant to 42 U.S.C. § 1981a.

1 8.5 Award Plaintiff costs and attorney fees pursuant to 42 U.S.C. § 2000e-5(k)  
2 and ADEA.

3 8.6 Grant such additional relief as is proper and just.

4 8.7 Conform the pleadings to the proof at trial.  
5  
6

7 DATED this 11 day of January 2008.  
8  
9

10 

11 Liaosheng Zhang

12 Pro Se Plaintiff